

EXHIBIT 1

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

1:20-CV-12229

Umuoji Improvement Union (North America) Inc.)
(North America) Inc.)
)
Vs.)
)
Umuoji Improvement Union (North America) Inc.)
Umuoji Improvement Union, Massachusetts Inc.)
Victor Ide-Okoye, and Ogor Okoye)
)

**DEFENDANTS' PROPOSED REPLY TO PLAINTIFF'S COUNSEL SUBMISSION ON
MAY 17, 2021 (Docs 38 and 39)**

Now comes Defendants, Umuoji Improvement Union (North America) Inc. Massachusetts, Inc. (hereinafter referred to as “UIUNA MA”), Victor Ide-Okoye, Umuoji Improvement Union, Massachusetts, Inc. and Ogor Okoye (collectively, “Defendants”) in the afore-mentioned matter and assert through counsel that Plaintiff’s counsel in bad faith, presented only one thread of email, and none whatsoever from Defendants’ counsel, which is meant to deceive this court.

Undersigned counsel attaches the entire email thread that shows the entire conversation had between the parties following the Judge’s Order. **See Exhibit A.** The timeline of the events pertinent to issues that were discussed by both counsel of record were as follows:

May 10, 2021 at 1:24pm

Defendants’ counsel sent out the first email to Plaintiff’s counsel proposing that both parties send four (4) delegates to meet in an attempt to settle once and for all the issues in this case as Defendants have no money to continue endless litigation when they have a medical facility in

dire need of medical equipment for Umuoji people who are equally in dire need of this facility. If they were unwilling to meet, then defendants are agreeable to the court appointing a master.

May 10, 2021 at 1:36pm

Plaintiff's counsel ignores the email and sends a new email to Defendants' counsel proposing the names of three mediators.

May 10, 2021 at 1:52pm

Attorney Pregent responds to Counsel original email by saying that both emails must have crossed paths but that he would reach out to undersigned counsel after consulting with his clients.

May 10, 2021 at 2:02pm

Undersigned counsel responded to Attorney Pregent stating her confusion with his response that was not responsive to her initial email and clarifying Defendants' position relative to matter; each side bringing forward, four (4) individuals who would attempt to resolve this. (preferably out of the courts) if that fails then opt for the court's proposal of a master to mediate.

May 12, 2021 at 10.51am

Attorney Pregent emails that he is re-extending their previous offer and made no mention of my request about both sides bringing out the four (4) people from their side to meet to resolve all of these issue the issue in this matter outside of the court.

Respectfully submitted,

/s/ _____
Ogor Winnie Okoye
BOS legal Group, LLC.
20 Central Ave. Ste. 513
Lynn, MA 01901
Tel/Fax: (781-596-0151)
Email: owo@boslegals.com

Dated May 19, 2021

CERTIFICATE OF SERVICE

I hereby certify that I have served Defendant's Motion for Leave of Court to file a response to Plaintiff's Proposed Rely to Defendant's Notice to Court via electronif filing on Plaintiff's Counsel, Travis Pregent, Esq. on the date set forth below in accordance with the Federal Rules of Civil Procedure and the Court's local rules.

Dated: May 19, 2021

/s/Ogor Winnie Okoye